

## **REMARKS/ARGUMENTS**

Reconsideration of this application is respectfully requested.

### ***Specification***

The Office Action objected to the title of the invention as not descriptive. The title is amended as suggested, and the objection is traversed.

The Office Action objected to a misspelled word on page 12 at paragraph [0043]. The spelling is corrected, and the objection is traversed. No new matter has been added.

### ***Claim Objections***

The Office Action objected to claim 18 because it depended on a non-existent claim. Claim 18 is amended to depend from claim 16, and the objection is traversed.

### ***Claim Rejections-35 U.S.C. § 102***

The Office Action rejected claims 1-4 and 14-18 under 35 U.S.C. 102(b) as being anticipated by Avakov, et al.

Claim 1 is amended to clarify that the gripper chain drive system includes at least first, second and third coil tubing gripping surfaces respectively adapted to grip a coil tubing string of a respective first, second and third diameter. The Avakov system does not disclose or teach at least three coil tubing gripping surfaces adapted to grip coil tubing strings of respectively different diameters. For at least this reason, claim 1 is allowable over Avakov, et al.

The Office Action rejects claims 1-4 and 14-18 as being anticipated by Dallas. Dallas teaches a coil tubing injector for injecting coil tubings of a first and second diameter.

As noted above, claim 1 has been amended to clarify that the gripper chain drive system includes at least three coil tubing gripping surfaces, each gripping surface adapted to grip a coil tubing string of a diameter different from the diameter of the other of the least three gripping surfaces. Dallas neither discloses nor teaches a system having at least three coil tubing gripping surfaces, each adapted to grip a different diameter coil tubing string. For at least this reason, the rejection is traversed.

### ***Claim Rejections-35 U.S.C. § 103(a)***

The Office Action rejected claims 5-13 and 9-20 under 35 U.S.C. 103(a) as being unpatentable over Dallas in view of Dearing, et al.

Dearing, et al. teaches a method and apparatus for running spooled tubing into a well. As taught in paragraph 42, "the wheel 114 preferably includes first and second grooves 142 of a

predetermined size. Typically, the first and second grooves 142 are of the same size and are used to propel spooled tubing strings 48 of the same size into the well 28. In the alternative, the grooves 142 may be of a different size. Ideally, the wheel 114 includes additional grooves of a size different than the grooves 142. This allows the spooled tubing unit to run different sized tubings into the well without replacing the wheel 114". As shown in Fig. 11, Dearing teaches that the wheel 142 includes four grooves, two of a first size and two of second size. Dearing fails to teach or suggest that each of the gripping blocks has at least four gripping surfaces, each of the gripping surfaces being respectively adapted to grip a tubing string of a different diameter, as claimed in amended claim 5. The rejection of claim 5 is thereby traversed.

With respect to claims 6-8, those claims are cancelled in view of the amendments made to claims 1-5, and the rejection of claims 6-8 is traversed.

Claim 9 is amended to place the claim in independent form claiming a coil tubing injector comprising at least three independently drivable gripper chain drive systems each respectively adapted to inject coil tubing of a different diameter either synchronously or asynchronously. No combination of Applicant's prior patent and Dearing, et al. teach or suggest the coil tubing injector assembly claimed in amended claim 9. The rejection of claims 9 and 10, 12 and 13, which depend therefrom, is traversed.

Claim 11 is cancelled in view of the amendments made to claim 9, and the rejection of claim 11 is likewise traversed.

With respect to claims 19 and 20, claim 19 is amended to clarify that the claimed method is directed to injecting or extracting at least three differently-sized coil tubing strings. For at least this reason, claim 19 is allowable over Applicant's prior patent and Dearing, et al., and the combination of the two references. The rejection of claims 19 and 20 is thereby traversed.

In view of the amendments to the specification and claims set forth above, this application is now considered to be in a condition for immediate allowance. Favourable reconsideration and early issuance of a Notice of Allowance are thereby requested.

Respectfully submitted,

NELSON MULLINS RILEY  
& SCARBOROUGH, L.L.P.

A handwritten signature in black ink, appearing to read 'Lloyd G. Farr', is written over a horizontal line.

Lloyd G. Farr  
Registration No. 38,446

1320 Main Street  
Columbia, SC 29201  
(404) 817-6165  
Fax (803) 255-9831